

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
W.R. GRACE & CO., <u>et al.</u> , ¹)	Case No. 01-1139 (JKF)
)	(Jointly Administered)
)	
Debtors.)	Related Docket Item No. 14950

**MOTION FOR LEAVE TO EXCEED PAGE LIMIT FOR REPLY TO DEBTORS'
RESPONSE TO CLAIMANT MACERICH FRESNO LIMITED PARTNERSHIP'S
MOTION FOR SUMMARY JUDGMENT AND RESPONSE TO DEBTORS' CROSS-
MOTION PURSUANT TO F.R.B.P. 7056 DISALLOWING AND EXPUNGING
MACERICH FRESNO LIMITED PARTNERSHIP'S CLAIM**

Macerich Fresno Limited Partnership ("Macerich"), by and through its undersigned counsel, hereby moves for authority to exceed the 5-page limit for Replies set forth in the Court's Amended Order Setting Various Deadlines Regarding Objections to Asbestos Property Damage Claims [Docket No. 13406] (the "Amended Order"), with respect to its Reply (the "Reply") to the Debtors' Response to Claimant Macerich Fresno Limited Partnership's Motion for Summary Judgment and Response to Debtors' Cross-Motion Pursuant to F.R.B.P. 7056 Disallowing and Expunging Macerich Fresno Limited Partnership's Claim [Docket No. 14897].

¹ The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc., E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil,

The Court's Amended Order set forth a five-page limitation for Replies (as defined in the Amended Order). *See* Amended Order at 3, ¶ 4. However, as a result of the Debtors having filed both a Response and Cross-Motion, it is now necessary for Macerich to include both its Reply to the Debtor's Response and its Response to the Debtors' Cross-Motion in the five pages allowed.

In light of the Debtors' filing of its Cross-Motion, it is necessary, and indeed would be beneficial for the Court, to permit Macerich to exceed, by two pages, the five-page limitation for Replies set forth in the Amended Order. The additional pages are needed to provide an accurate and complete discussion of the facts and legal issues.

WHEREFORE, Macerich respectfully requests the entry of an Order, substantially in the form attached hereto as Exhibit A, granting Macerich authority to exceed page limitation set forth in this the Amended Order, and for such additional relief as the Court deems appropriate.

Dated: March 23, 2007

ASHBY & GEDDES, P.A.



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EXHIBIT A

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In re:)	Chapter 11
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W.R. GRACE & CO., <u>et al.</u> ,)	Case No. 01-1139 (JKF)
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ORDER GRANTING MOTION FOR LEAVE TO EXCEED PAGE LIMIT

Upon the motion (the “Motion”) of Macerich Fresno Limited Partnership (“Macerich”) for leave to exceed the five-page limitation set by the Court’s Amended Order Setting Various Deadlines Regarding Objections to Asbestos Property Damage Claims [Docket No. 13406] with respect to Macerich’s Reply to the Debtors’ Response to Claimant Macerich Fresno Limited Partnership’s Motion for Summary Judgment and Response to Debtors’ Cross-Motion Pursuant to F.R.B.P. 7056 Disallowing and Expunging Macerich Fresno Limited Partnership’s Claim [Docket No. 14950] (the “Reply”); and having found that sufficient cause exists to grant the relief sought in the Motion;

IT IS HEREBY ORDERED THAT:

- A. The Motion is granted in its entirety; and
- B. Macerich is hereby granted leave to exceed the five-page limitation with respect to its Reply.

Dated: _____, 2007

Honorable Judith K. Fitzgerald
United States Bankruptcy Judge